

Harold Derschowitz (x263)

From: numoh@umohlaw.com
Sent: Wednesday, August 06, 2008 10:06 PM
To: Deborah MartinNorcross
Cc: Harold Derschowitz (x263); chidieze@yahoo.com
Subject: RE: Mann v. Plus One, etc.
Attachments: mann, pay stubs1.pdf; Mann, pay stubs 2.pdf

Counselors--

Plaintiff has responded in good faith to all the requests by the defendants. We await your motion. Also, please find attached plaintiff's pay stubs from her employment at Pacific Islands Club. They are Bates Stamped 000796 - 000806

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----- Original Message -----

Subject: Mann v. Plus One, etc.
From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>
Date: Wed, August 06, 2008 6:15 pm
To: "chidieze@yahoo.com" <chidieze@yahoo.com>, "numoh@umohlaw.com" <numoh@umohlaw.com>
Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

Dear Messrs. Eze and Umoh:

The Court afforded your client a final opportunity to respond properly to Defendants' discovery. You had until today.

8/26/2008

Not only have you not properly supplemented, you have not supplemented at all.

Please be advised that we will be seeking not only the evidential sanctions to which Judge Buchwald referred on July 30, 2008, but also monetary and other sanctions. *See e.g.* affirmative defenses asserted by Defendants Plus One Holdings, Inc. and Jamie Macdonald.

Deborah Martin Norcross

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8/26/2008